



Minneapolis Public Schools

1250 W Broadway Avenue, Minneapolis, MN 55411

Report to the United States Department of Education Office of Civil Rights, Region V

Re: Compliance Review #05-12-5001

United States Department of Education
Office for Civil Rights Region V
500 West Madison St., Suite 1475
Chicago, IL 60661-4544

Prepared by: Kevin Bennett, POSA/PSWE
November 30, 2016



Introduction

Minneapolis Public Schools established a Positive School-Wide Engagement Department (PSWE) to oversee the implementation of the Office of Civil Rights Resolution Agreement #05-12-5001.

PSWE Purpose

The purpose of the District PSWE Department includes the following:

- Serve as a monitoring and compliance entity within MPS to ensure students receive fair and equitable treatment and due process to ultimately reduce the disproportionality of suspensions and loss of educational instruction time
- Ensure all MPS schools implement Resolution Agreement #05-12-5001 and District policies in a fair and equitable way
- Provide consistent and high quality technical and adaptive assistance around Resolution Agreement #05-12-5001 and discipline guidelines while promoting improved student engagement and school climate

Accountability for MPS Students and Families

1. Establish a clear understanding of Resolution Agreement #05-12-5001
2. Ensure accuracy and promote transparency regarding data collection, documentation and reporting
3. Guarantee fair and equitable treatment for students and families
4. Support students and families to receive high quality due process
5. Promote positive school and student engagement

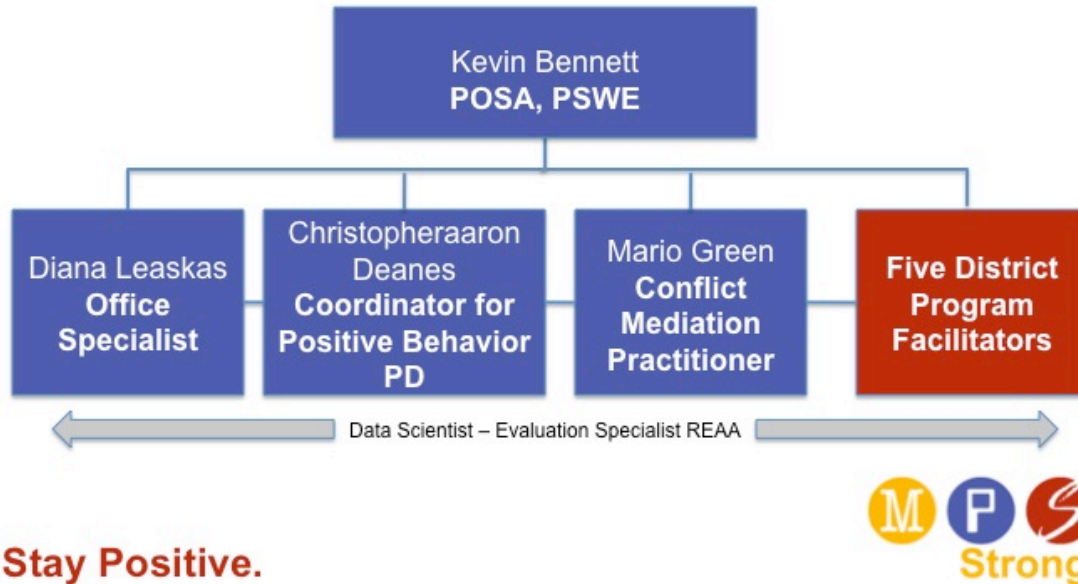
Updates for 2016-2017 Reporting: Restructure, Refocus and Review

District PSWE Department Team Increased and Restructured

New Leadership

The principal on special assignment (POSA hereafter) position, tasked with heading the District PSWE Department, was vacant for much of 2015-2016 reporting year. MPS took steps to recruit and hire an experienced principal to restructure the department and lead the work. In August 2016, Kevin Bennett, the 2012 Minnesota Middle School Principal of the Year, began the role of district discipline supervisor as required in the Resolution Agreement #05-12-5001. Mr. Bennett has the demonstrated capacity to dramatically improve student outcomes, increase engagement through innovative approaches and is a recognized leader in racial equity.

Positive School Wide Engagement Department (PSWE)



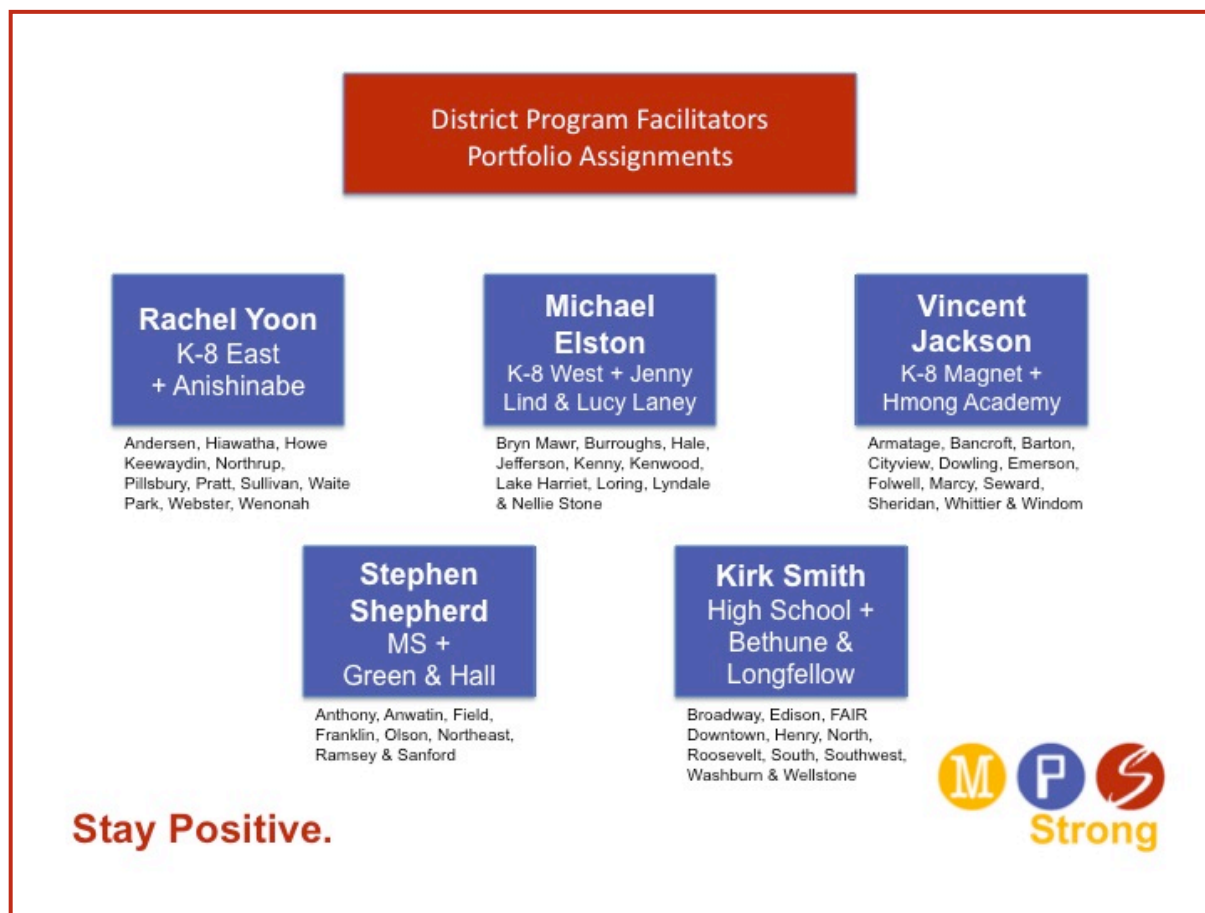
PSWE Professional Development Coordinator and Conflict Mediation Practitioner

The District PSWE Department provides technical assistance and training in the PBIS Model, data collection/reporting and restorative practices through the coordinator for positive behavior professional development position.

- Christopheraaron Deanes, a licensed school administrator and former teacher, works in the District PSWE Department. Mr. Deans has extensive experience with restorative practices, student engagement and professional development.

As part of the commitment to proactive and restorative practices, the department hired a full-time District conflict mediation practitioner to support and assist school sites based on evidence-based restorative practices as required by the Resolution Agreement #05-12-5001.

- Mario Green, an experienced coach, educator and dean of students, serves as the conflict mediation practitioner for the District. Mr. Green has extensive experience as a behavioral dean and expertise in implementing restorative practices.



District Program Facilitators

Under the guidance of the POSA, MPS added five new District Program Facilitator positions in 2016-2017 to the District PSWE Department. District Program Facilitators (DPFs hereafter) were strategically recruited and hired in order to build a team with the knowledge and skills necessary to implement the Resolution Agreement #05-12-5001 and support sites. **In addition, DPFs are designated to address complaints from students, parents/guardians and others.**

- Rachel Yoon, a licensed teacher, oversees a portfolio of K-8 schools on the east side of the school district. Ms. Yoon is an experienced teacher leader with expertise in student engagement, school improvement and instructional leadership.
- Stephen Shepherd oversees a portfolio of all district middle schools. Mr. Shepherd is a licensed teacher with administrative experience along with a strong understanding of youth development and behavioral supports.

- Michael Elston, a licensed school administrator, oversees a portfolio of K-8 schools on the west side of the school district. Mr. Elston is an experienced teacher leader with administrative experience and expertise in student engagement, school improvement and instructional leadership.
- Kirk Smith oversees a portfolio of all district high schools and has extensive leadership experience. As a licensed teacher, Mr. Smith is a Positive Behavior Intervention and Supports (PBIS) coach/trainer and has designed multiple intervention systems.
- Vincent Jackson, a licensed teacher, oversees a portfolio of all district magnet programs. Mr. Jackson is an experienced special education teacher and dean of students who has extensive knowledge in student engagement initiatives.

District PSWE Partnerships

To best serve our students and families, the District PSWE Department believes in the importance of working partnerships with community organizations. The department understands that additional strength comes from the guidance and resources available through strategic partners. Recently, PSWE began this outreach with the following:

- Minneapolis Office of Civil Rights (Director Velma Korbel)
- Community Justice Project, Interprofessional Center for Counseling and Legal Services, University of St. Thomas, Minneapolis, MN (Professor Carl Warren)

District PSWE Department Needs Assessment – Early Findings

Under its new leadership, the District PSWE Department conducted a needs assessment and fact-finding review (beginning in August 2016) and found the following:

1. Lack of understanding of the Resolution Agreement #05-12-5001 amongst senior leadership, Davis Center staff, school site administrators, teachers and families.
2. No documented communications to students and families about where to find resources if they believe they are not receiving fair and equitable treatment.
3. Failure to complete and report root cause analysis.
4. Significant errors, inaccuracies and inadequacies around data collection, analysis and investigation, evidence collection and documentation and reporting.
5. Little evidence of information and institutional knowledge transfer around the context and history of Resolution Agreement #05-12-5001.
6. Breakdown in accountability structures with no clear ownership of the oversight and implementation of Resolution Agreement #05-12-5001.
7. Lack of internal communication between departments and with schools.
8. Signs that Davis Center and schools are not psychologically safe (*Teaming*, Amy C. Edmondson, Harvard).

9. Lack of understanding and commitment to racial equity transformation.
10. No evidence that the Resolution Agreement #05-12-5001 was aligned to teacher SOEI and principal evaluation processes.

In addition, through review of the 2015-2016 scope of work, it was found that school sites had a tendency to request crisis consultation rather than evidence-based, coherent approaches to improving engagement and reducing suspensions. As a result, the District PSWE team often responded reactively on an individual school site basis rather than proactively on a systemic level. Results and training were fragmented as a result and the efforts were difficult to sustain.

It was also found that during the budgetary planning phase for 2016-2017, the District PSWE Department lacked adequate personnel and resources to properly implement the Resolution Agreement #05-12-5001 across all school sites. The department also lacked the capacity to inform and coordinate with associate superintendents' efforts to coach and develop site leaders and teams to improve student engagement and academic outcomes while reducing disproportionality of suspension rates and disparate treatment.

The former staffing structure and the scope of work specifically inhibited District progress in the following ways:

- Exact compliance to Resolution Agreement #05-12-5001
- Hindered review of data
- Ability to respond to parent/community complaints and communication to superintendent and/or designee about incidents where different treatment or disparate impact occurred
- Ability to provide high quality technical and adaptive assistance to schools in meeting the requirements of Resolution Agreement #05-12-5001
- Creation of systems that maximize resources to support student and teacher success in positive school-wide engagement
- Capacity-building within each school to embed positive school-wide engagement in daily practices

Evidence to Support Findings

Currently, according to MPS' student information system, Discovery, data shows that racial disparities continue to exist and total suspensions have increased by nearly 450* from school year 2014-2015 (i.e., MPS 2014-15 Out of School Suspensions = 3228; 2015-2016 = 3680). According to MPS discipline incident submissions and the Minnesota Department of Education (MDE) 2015-2016 DIRS Report, data shows that racial disparities continue to exist and total suspensions have increased by nearly

1,700* from school year 2014-2015 (DIRS 2014-15 Out of School Suspensions = 3,135; 2015-2016 = 4,839). **(See 2015-2016 MPS DIRS Report, Certified October 2016)**

**NOTE FROM CHIEF INFORMATION OFFICER: Prior to submission of the DIRS data, MPS technology staff worked collaboratively with the Minnesota Department of Education to address issues of interoperability between the two IT systems. Some, however, not all interoperability issues were resolved prior to submission. MPS technology staff have diagnosed the remaining issues related to interoperability, and continue to work with the MDE to correct the discrepancies related to total suspensions going forward.*

To adequately monitor the system, the PSWE Department has completed training and/or certification in the following areas:

1. Racial Equity Transformation
2. Leadership Coaching
3. Conflict Resolution
4. Restorative Practices
5. Historical and Cultural Trauma
6. Psychological First Aid
7. Social Emotional Learning
8. PBIS and Student Engagement Strategies
9. Nonviolent Crisis Interventions (NCI)
10. Circle Keeping

District PSWE Department utilizes their training through learning walks, climate visits and formal/informal meetings to monitor the system.

PSWE Alignment and Actions

Note: Initiatives and KPIs are under review and modification due to ongoing findings and root cause analysis.

PSWE Initiatives	Key Performance Indicators	Findings	4 Key Areas & 2020 Goals*	Initial Action Steps Taken
1. Ensure all sites have a PSWE lead, team and plan. • Plans demonstrate alignment to best practices and utilize data to drive continuous improvement. • Efforts focused	<ul style="list-style-type: none"> • OCR documentation includes designated lead and team roster • All sites receive: <ul style="list-style-type: none"> - Plan feedback - Regular monitoring of plan 	1, 5, 6, 7, 8, 9	Achievement Equity Engagement Accountability Goals 1 & 2 Goal 4 Goal 5 Goal 6	DPF Tracking Document Increase staffing for PSWE Workflow Tracker Learning walks and climate visits

PSWE Initiatives	Key Performance Indicators	Findings	4 Key Areas & 2020 Goals*	Initial Action Steps Taken
on improving overall student engagement and eliminating practices that negatively and disproportionately impact students of color.				
2. Provide consistent and high quality technical assistance to PSWE lead, team and building administration.	<ul style="list-style-type: none"> • Workflow tracking document • Customer satisfaction survey • Feedback from principals, forum and associate superintendents 	7, 8, 9	Achievement Equity Engagement Accountability Goals 1 & 2 Goal 3 Goal 4 Goal 5 Goal 6	Toolkit Student/Family Discipline Complaint Summaries Written communication and video PSWE Institute
3. Identify problems of practice, engage with key departments, implement solutions and report out progress to stakeholders.	<ul style="list-style-type: none"> • Root cause analysis (2 priority problems of practice identified by 2016-2017 team) • Documentation of solutions, positive impacts and key learning (shared with stakeholders, OCR, Steering Committee and Cabinet) 	2, 3, 4, 8, 9	Achievement Equity Engagement Accountability Goal 3 Goal 4 Goal 5 Goal 6	DPF Tracking Document Workflow Tracker

PSWE Initiatives	Key Performance Indicators	Findings	4 Key Areas & 2020 Goals*	Initial Action Steps Taken
4. Increase professional development opportunities for instructional support staff to improve data integrity, implement classroom engagement plans and utilize restorative practices.	<ul style="list-style-type: none"> • Year-long PD calendar • PD descriptions include intended outcomes for learners and schools • Log of PD participants (rosters) • Workflow document showing onsite trainings and technical assistance • Evaluations of trainings (PD department) 	4, 5, 6, 7, 8, 9	Achievement Equity Engagement Accountability Goal 4 Goal 5 Goal 6	PSWE team training – build internal capacity Review PSWE site plans to include assessment of alignment Consult with other departments to ensure alignment with Resolution Agreement #05-12-5001 and best practice Quarterly IT meeting schedule to ensure fidelity
5. Identify and document emerging best practices and innovative approaches to engagement through action research, video, interviews, cross-site learning walks, etc. <i>(Learning walks are designed to foster collaboration across sites and</i>	<ul style="list-style-type: none"> • Regular features in district-level communications • Documentation of emerging best practices as part of regular meeting agendas • Development of additional resources for toolkit • Scheduling of cross-site learning walks 	1, 2, 4, 5, 6, 7, 8, 9	Achievement Equity Engagement Accountability Goals 1 & 2 Goals 3 Goal 4 Goal 5 Goal 6	PSWE department staffing and work Collaboration with Communications Department

PSWE Initiatives	Key Performance Indicators	Findings	4 Key Areas & 2020 Goals*	Initial Action Steps Taken
<i>build site capacity for engagement)</i>				
6. File reports to OCR on time and represent accurate descriptions as to the status of the agreement implementation.	<ul style="list-style-type: none"> • Reports completed by OCR deadline • Digital and paper files updated • Transparent reporting on areas of concern/sites that are non-compliant 	1, 2, 5, 6	Accountability Goal 5 Goal 6	Received extensions from OCR in order to file accurate reports (Due November 30)
7. Establish mini-grants for middle and high schools to authentically increase student engagement.	<ul style="list-style-type: none"> • Plan for grant guidelines and develop communication • Supplemental funds secured • Plan for evaluation of impact developed 	1, 7, 8, 9	Achievement Equity Engagement Accountability Goals 1 & 2 Goal 3 Goal 4 Goal 5 Goal 6	Collaboration with Communications Department
8. Design mediation services and alternative suspension practices so that all students have access to consistent and high quality due process.	<ul style="list-style-type: none"> • PSWE team meeting agendas include regular review of data • Development of document with detailed due process plan • Due process plan reviewed by general counsel and presented to cabinet 	1, 2, 5, 8, 9	Achievement Equity Engagement Accountability Goals 1 & 2 Goal 4 Goal 5 Goal 6	Staffing of conflict mediation practitioner Review and evaluate current contracts of practice

PSWE Initiatives	Key Performance Indicators	Findings	4 Key Areas & 2020 Goals*	Initial Action Steps Taken
9. Build and implement data sharing communication stream and required follow through by principals and associate superintendents	• Communication templates and structure	4, 5, 7	Accountability	Develop guidelines for data

*Strategic Plan: Acceleration 2020 Goals

Goals 1 & 2: Improve Student Outcomes & Equity
 Goal 3: Families & Community Partnerships
 Goal 4: Effective Teachers, School Leaders & Staff
 Goal 5: Stewardship
 Goal 6: Resources for Students & Schools

District PSWE Proposed Next Steps (Needs Assessment Response)

1. Complete root cause analysis
2. Address psychological safety
3. Ensure racial equity transformation is infused in PD
4. Develop a logic model that aligns to both the technical and adaptive requirements of Resolution Agreement #05-12-5001
5. Develop communication plan
6. Develop and design data dashboard for site-based and district recommendations to Resolution Agreement #05-12-5001
7. Involve students and families to increase positive school culture and climate
8. Establish on-going technical support

MPS Resolution Agreement #05-12-5001 Interim Report

Outreach to Students, District Staff and Community Members

Resolution Agreement #05-12-5001: Item #3 - Student Forums

Process: School sites were instructed to conduct annual student forums. In order to ensure compliance with fidelity, DPFs made numerous personal visits and provided consistent communication and technical assistance to school sites regarding the proper execution of student forums. Student forum documentation sheets were revised to ensure that documentation is in alignment with the Resolution Agreement #05-12-5001.

Compliance Status and Required Reporting: Student forums were conducted at 42 out of 62 sites. Sites have recorded the date, time, length and location of each forum, the number of students attending as well as a summary of the concerns from each session (**See Appendix folder OCR 3**).

Percentage of school sites in compliance: **72.58%**

Number of sites out of compliance or lacking evidence/documentation with one or more requirement: **17**

Summary of Student Concerns and Suggestions: The following is a summary of input from the student forums compiled by the data review team:

1. Students believe relationships between students and teachers could improve
- 2. Students identify unfair and inconsistent treatment (Students want more consistency)**
3. Students want to feel safe
4. Student input reflects an overall lack of due process (Schools don't listen to both sides, they make assumptions, etc.)
- 5. Students want a 'focus-on-self' – more personalization and opportunities to explore strengths and interests**
- 6. Students want middle school athletic programs and more high school opportunities**
7. Students believe that some categories are miscategorized within District Behavior Standards
8. Students communicate that they see Level 1 and 2 behaviors and response is heavy-handed/inconsistent
9. Students voiced many concerns about bus climate
10. Students identify need for alternatives to suspensions and additional positive options/alternatives
11. Students feel that there could be more transparency and follow through when there is a report
12. Students communicated uneven/inconsistent experiences with behavior standards policy
- 13. Students want more culturally relevant learning opportunities**

Next Steps and District Responses to Student Concerns and Suggestions: The following are the District's response to the summary of concerns and suggestions expressed by Minneapolis students:

Improve School Culture and Climate: Improvements established through Learning Walks with DPFs and establishment of conflict mediation practitioner and coordinator for positive behavior professional development positions.

Transportation/Bussing: Establish a dialogue with transportation department. Review bus safety policies and practices and gain understanding of how discipline is issued from transportation department.

Provide Due Process: District PSWE Department develops logic model and plan for implementing due process and parent complaint review pilot with Minneapolis Office of Civil Rights (Spring 2017).

Improve Forum Process: Review student forum process annually by District PSWE Department to identify areas of improvement and adopt best practices. Exemplary student forums will be highlighted and leveraged to increase capacity of school sites to more effectively facilitate meaningful forums. The goal is to elicit more pertinent feedback and better engage students in the process of thinking, planning and implementing solutions.

Increase Student Engagement and Agency: To better engage students, there needs to be opportunities to turn student voice into student action. Beginning this school year, MPS middle and high school students will have the opportunity to apply for mini-grants to transform their voice and ideas into action in their schools and communities. In addition, student committees at each site will be empowered to plan and facilitate the student forum process next school year.

Increase Student Opportunities: Advocate for more middle school and high school athletic opportunities. Also, establish partnerships with community organizations to provide culturally relevant and personalized learning opportunities to build on students' strengths.

Increase Site Accountability: School sites who are out of compliance with conducting forums in a timely manner, are not in accordance with the identified parameters and format, or who fail to respond to suggestions for improvement will be reported to the superintendent and or the superintendent's designee as part of the data review process (as per OCR 19).

Resolution Agreement #05-12-5001: Item #4 - Student Committees

Process: The Research, Evaluation, Assessment, and Accountability Department (REAA hereafter) continues to use Youth Participatory Evaluation (YPE hereafter) as a framework to meet the requirements under item four of the Resolution Agreement #05-12-5001 to establish student committees to discuss and recommend changes to the District's discipline policies and practices.

Compliance Status:

- a. The District has taken steps to ensure that student committees are representative of each school's student population and will encourage African American students and members of other marginalized student groups to participate on the committees **as evidenced by the YPE kickoff informational session and the 2016-2017 YPE rosters.**
- b. The District has encouraged students who have been subjected to disciplinary consequences and students who are struggling academically to participate on or provide input to the committees **as evidenced by the YPE kickoff informational session and the 2016-2017 YPE rosters.**

- c. The District has encouraged the student committees to identify the aspects of the District's educational program they see as positive and likely to encourage positive student behavior and the aspects of the District's educational program they see as negative and likely to result in student misbehavior. The student committees have been encouraged to identify actions students can take to help their classmates engage in positive school behavior **as evidenced by the YPE kickoff informational session and the YPE October summary. There is no evidence to support** that student committees have assisted in the development and presentation of the forums discussed in Resolution Agreement #05-12-5001, Item 3.
- d. There **is no evidence** to suggest that student committees have been denied the same privileges as other District extracurricular activities, including access to meeting space in District schools and public notice about the committees, meeting schedules and activities.
- e. The District has appointed a District staff person to work with each committee to assist them in operating efficiently and effectively and in organizing their reports to the District. District staff persons have been informed of their role to participate in the committees' activities solely for the purpose of assisting them in achieving their objectives and will not attempt to influence or control the committees' discussions **as evidenced by the YPE kickoff informational session and the 2016-2017 YPE rosters.**
- f. The student committees have been informed that they will be tasked with providing specific suggestions for improving the District's discipline policies, practices and procedures and establishing a safe school environment that is conducive to learning via the submission of a written report by no later than April 30th of each school year **as evidenced by the YPE kickoff informational session and the YPE Timeline for 2016-2017.**
- g. The District will carefully consider the suggestions submitted by the student committees and develop a plan for implementing the suggestions as appropriate by no later than June 30th of each school year. The District will provide the committees with a copy of the plan.

Required Reporting: Student committees have been established at 29 out of 32 sites with students in grades 6th-12th. Sites have recorded the identity of the members of each student committee, the District employees designated to coordinate the activities of each committee, and have sent examples of student work created during the initial activities of each group **(See Appendix folder OCR 4).**

Percentage of school sites in compliance: **90.63%**

Percentage of school site student committees providing evidence of participation in initial activities as summarized below: **71.88%**

Number of Sites out of compliance or lacking evidence/documentation with one or more requirement: **9**

Summary Report of Student Committees Initial Activities: The following is a summary of the initial activities of the student committees compiled by the REAA team:

Fall Kickoff Meeting: All advisors were invited to a fall kickoff event in late August; about half of the attendees were returning advisors and half were new to the program this year. At this meeting, the project coordinator provided an overview of the program, including information about the District's Resolution Agreement #05-12-5001 with OCR. As documented in the presentation deck (Appendix OCR 4), a crucial goal of this event was to guide advisors in their role supporting authentic youth voice. The project coordinator also emphasized the important partnership with REAA's evaluation team to bring rigorous research methods to these youth projects.

Fall Summit Workshops: To help provide structure and support for successful implementation of the program, REAA hosted a Fall Summit workshop for all YPE teams in October. To account for logistical challenges and to facilitate deeper learning, the team hosted three identical, but separate, workshops. As noted in the schedule (Appendix OCR 4) participatory data collection methods that feel like a game to the respondent were embedded throughout the day to help YPE participants consider engaging ways to gather student voice.

Summary of Student Feedback from Committees: The following is a summary of input collected from the student committees and compiled and grouped by the REAA student committee team during their initial activities:

Teachers/Curriculum (We Deserve Better #teachme)

- Lack of relevant curriculum
- Pace of instruction; delivery of instruction (lecturing rather than group work)
- Too much homework; stress from schoolwork
- Lack of differentiation

Student Relationships (Increase the Peace)

- Students disrespect each other; students lack empathy for others
- Verbal/emotional bullying
- Physical bullying
- Social groups/cliques

School Policies (Unfair Rules #respectgoesbothways)

- Teacher or staff bias in policy implementation (dress code, behavior, etc)
- Lack of student voice

School Distractions (Stop Distracting Me #stayfocused)

- Lack of focus among peers
- Profanity/inappropriate conduct
- Student drama
- Absenteeism

Student Voice (Youth Need Voice and Choice)

- Personal choices (religion, food preferences, perspectives) not valued by leadership
- Schedules (school start times, class selection, recess/opportunities to move)

Resource Distribution (Lack of Resources #wrongpriorities)

- Not enough school counselors or adult support
- Outdated or absent technology
- No sports in middle schools

Next Steps:

Increase Student Engagement and Agency: To better engage students, there needs to be opportunities to turn student voice into student action. Beginning in the 2016-2017 school years, MPS middle and high school students will have the opportunity to apply for mini-grants to transform their voice and ideas into action in their schools and communities. Student Committees at school sites will be empowered to plan and facilitate the student forum process next year.

Identify Needed Improvements in Teacher Training and Curriculum: The District PSWE Team will brief the Teaching and Learning Department and the Academic Leadership Team to identify and explore improvements with how teachers are trained and how the curriculum is reviewed to ensure it remains relevant. These departments will report back to student committees as to how the student concerns will be addressed.

Identify Needed Improvements in Budgeting and Resource Distribution: The District PSWE Team will brief the Finance Department to identify and explore improvements and identify disparities. The Finance Department will report back to student committees as to how the student concerns will be addressed and how students and families can have an opportunity for input into the budgeting process.

Re-Align to Ensure Focus of Resolution Agreement #05-12-5001 Is at Core of Student Committees: District Staff who coordinate the Student Committees will be trained on the Resolution Agreement #05-12-5001 to ensure that the activities of the committees stay in clear alignment with the Resolution Agreement #05-12-5001. Exemplary student committees will be highlighted and leveraged to increase capacities of school sites to more effectively facilitate meaningful student committees.

Increase Engagement: In order to ensure that the voices of those most affected by MPS disciplinary policies, practices, and procedures, focus groups will be held to hear firsthand how to better engage students in the process of soliciting feedback and looking for novel solutions to persistent issues around school disciplinary policies, practices and procedures.

Increase Capacity to Assist with the Development and Presentation of the Student Forums: Student committees will have an increased role in the planning and facilitation of student forums working in collaboration with site administration,

site working groups, and DPFs.

Resolution Agreement #05-12-5001 Item #5 - Working Groups

Process: The District has utilized its School Site Positive School-Wide Engagement Team Structure (hereafter School Site PSWE Team) to fulfill item 5 of the Resolution Agreement #05-12-5001 requiring the creation of a working group at each District school consisting of school personnel, including teachers, administrators and other school staff who are involved in making discipline referrals and imposing disciplinary sanctions, parents of school students and community leaders. In order to ensure compliance with fidelity, DPFs made numerous personal visits and provided consistent communication and technical assistance to school sites regarding the proper development of working groups at each school site.

Compliance Status

- a. Working groups have consulted with District experts as **evidenced by the presence of District Program Facilitators on School Site PSWE Teams.** School Site PSWE Teams are aware that they will make recommendations to the District regarding the effectiveness of the District's discipline policies, practices, and procedures **as evidenced by the toolkit, August and October POSA District PSWE Department Memos, ongoing meetings and site visits by DPFs.**
- b. The District has taken steps to ensure that the working groups are representative of each school's student population and has encouraged the parents or guardians of Black and other minority students to participate in the working groups **as evidenced by the toolkit, August and October POSA District PSWE Department Memos, ongoing meetings and site visits by DPFs.**
- c. At each school, the School Site has designated an employee to coordinate the group's meetings and work **as evidenced by the School Site PSWE Team Leads identified in the School Site PSWE Rosters.**
- d. Working groups are aware that they will be asked to provide District officials with input regarding strategies for improving student behavior, addressing student misbehavior by means other than disciplinary sanctions, and reducing any racial disparity in referrals for discipline, the imposition of disciplinary sanctions and the exclusion of students from the educational program **as evidenced by the toolkit, August and October POSA District PSWE Department Memos, ongoing meetings and site visits by DPFs.**
- e. Working groups are aware that they will also be asked to provide continuing input to District officials regarding strategies to ensure that school staff members have access to or are aware of available resources for assisting them in managing and de-escalating student behavior **as evidenced by the toolkit, August and October POSA District PSWE Department memos, ongoing meetings and site visits by DPFs.**
- f. Working groups are aware that they will also provide specific suggestions for developing training and informational programs, as described in items 10 and 11,

that promote a safe and orderly educational environment and ensure the fair and equitable treatment of all students when making disciplinary referrals and imposing disciplinary sanctions **as evidenced by the toolkit, August and October POSA District PSWE Department memos, ongoing meetings and site visits by DPFs.**

- g. The groups are aware that they will need to consider if and how outreach efforts to families can be made to garner support for the District's discipline policies, practices and procedures and for the District's goal of addressing student misbehavior without excluding students from the educational programs **as evidenced by the toolkit, August and October POSA District PSWE Department Memos, ongoing meetings and site visits by DPFs.**
- h. The working group is aware that a designated employee will prepare a written summary of the recommendations and suggestions of the working group and submit a report to the District setting forth the recommendations and suggestions by no later than April 30 of each school year **as evidenced by the toolkit, August and October POSA District PSWE Department memos, ongoing meetings and site visits by DPFs.**
- i. The District is aware that it will review the report submitted by the working groups and develop a plan for implementing the groups' recommendations and suggestions as appropriate by no later than June 30th of each school year. The District will then provide the working groups with a copy of the plan along with a written explanation of the reasons why any recommendations or suggestions made by the working groups are not being implemented.

Required Reporting: School Site PSWE Teams have been established at 62 out of 62 sites. Sites have recorded the identity of the members of each School Site PSWE Team, as well as the District employees designated to coordinate the activities of each working group, and a summary of the initial activities of each group (See Appendix folder OCR 5).

Percentage of school sites in compliance: **100%**

Percentage of School Site PSWE Teams with parent and community representatives: **24.19%**

Percentage of School Site PSWE Teams submitting summary of initial activities: **48.39%**

Number of sites out of compliance or lacking evidence/documentation with one or more requirement: **47**

Next Steps:

Improve Reporting Process: The District PSWE Team will create a reporting template to ensure that School Site PSWE Team reports are aligned with the requirements of the Resolution Agreement #05-12-5001.

Re-Align to Ensure Focus of Resolution Agreement #05-12-5001 is at Core of School Site PSWE Teams: School site staff who coordinate the School Site PSWE Teams will be trained on the OCR Requirements to ensure that the activities of the teams stay in clear alignment with the Resolution Agreement #05-

12-5001 and that reports are done accurately and on time. Exemplary School Site PSWE teams will be highlighted and leveraged to increase capacities of school sites to more effectively facilitate meaningful and impactful teams.

Formalize Collaboration Between School Site PSWE Teams and School Site Councils: By leveraging already existing structures, school sites can ensure that their School Site PSWE team has community and parent representation with a particular focus on ensuring that school site PSWE teams are representative of the school student demographics.

Increase Engagement: Increase student engagement through culturally relevant, valued and personalized learning opportunities for students (athletics, interest-driven partnership opportunities, youth development programs, etc.). In addition, develop staff capacity to positively and consistently address Level 1 and 2 behaviors within the classroom.

Increase Site Accountability: School sites who are out of compliance with the creation of School Site PSWE Team or are not in accordance with the identified parameters and reporting timeline and format or who fail to respond to suggestions for improvement will be reported to the superintendent and or the superintendent's designee as part of the data review process (as per OCR 19).

Resolution Agreement #05-12-5001: Item #6 - Parent/Guardian Forums

Process: School sites were instructed to conduct annual parent forums. In order to ensure compliance with fidelity, DPFs made numerous personal visits and provided consistent communication and technical assistance to school sites regarding the proper execution of parent forums. Parent forum documentation sheets were revised to ensure that documentation of parent forum events were in alignment with the Resolution Agreement #05-12-5001.

Compliance Status

- a. All District school sites were instructed to ensure forums provided parents with the opportunity to raise concerns or suggestions regarding the improvement of the District's disciplinary policies, including any issues in connection with fairness and non-discrimination **as evidenced by the toolkit, August and October POSA District PSWE Department memos, ongoing meetings and site visits by DPFs.**
- b. All District school sites were advised that all parent forums must include officials involved in the administration of discipline (e.g., administrators, teachers, behavior interventionists, guidance counselors) **as evidenced by the toolkit, August and October POSA District PSWE Department memos, ongoing meetings and site visits by DPFs and Forum Documentation sheets.**
- c. All District school sites were advised to emphasize the District's commitment to using the policies referenced in the Resolution Agreement #05-12-5001 to ensure a safe and orderly educational environment and to ensure the fair and equitable treatment of all students when making disciplinary referrals and imposing disciplinary sanctions **as evidenced by the toolkit, August and October POSA**

District PSWE Department memos, ongoing meetings and site visits by DPFs and the Discipline Policy video.

- d. All District school sites were instructed to advise the parents or guardians of the right of students to appropriate due process in connection with any disciplinary action taken or proposed by the District **as evidenced by the toolkit, August and October POSA District PSWE Department memos, ongoing meetings and site visits by DPFs and the Discipline Policy video.**
- e. All District schools were instructed that parent forums needed to include but not be limited to detailed explanations of the discipline policy, the definitions of offense categories, the specific manner in which progressive disciplinary consequences will be employed, if applicable, the circumstances under which deviations from established policies may be justified, resources that are available to students to assist them in developing self-management skills and the District's commitment to recognizing and reinforcing positive student behavior and to ensuring to the maximum extent possible that misbehavior is addressed in a manner that does not require removal from the educational program **as evidenced by the toolkit, August and October POSA District PSWE Department memos, ongoing meetings and site visits by DPFs and the Discipline Policy video.**
- f. All District schools were instructed to advise the parents or guardians whom they may contact if they have any concerns about the manner in which the District's discipline policies are being implemented or if they need assistance in addressing student behavioral problems **as evidenced by the toolkit, August and October POSA District PSWE Department memos, ongoing meetings and site visits by DPFs and the Discipline Policy video.**

Required Reporting: Parent forums were conducted at 39 out of 62 sites. Sites have documented that the information programs required by this item have been conducted, and have provided any recommendations, suggestions or reports that were provided by parents or guardians at the programs (See Appendix folder OCR 6).

Percentage of school sites in compliance: **66.13%**

Number of sites out of compliance or lacking evidence/documentation with one or more requirement: **21**

Summary of Parent/ Guardian Concerns, Recommendations and Suggestions:

The following is a summary of input from the parent forums compiled by the data review team.

- Overall desire for more communication (Recommended proactive and more frequent)
- Communicate policy consistently and fairly
- Concern for impact on kids with IEPs/HHM
- Families support changes in policy and support restorative approach
- Support for equitable educational practices to improve overall behavior
- Families want to support: PTA, Family Mentoring, at risk students
- Kids need physical activity
- Want alternative suspensions (Keep kids in class, recognize positive

- behaviors)
- Video improvements

Next steps and District Plans in Response to Suggestions and

Recommendations: The following are the District's plans to respond to parent and guardian input from forums.

Improve Complaint Review Process: MPS District will develop and provide an open and well-communicated process to intake and process parent and community complaints.

Provide Due Process: Due process system provided through the restructure and focus of the PSWE Department and compliance to the Resolution Agreement #05-12-5001. Publically communicate process to community. (See page 22)

Improve Communication: MPS District will draft a new communication plan to ensure that families are aware of due process and the existence of a department within MPS tasked with addressing their complaints and ensuring the fair and equitable treatment of their students.

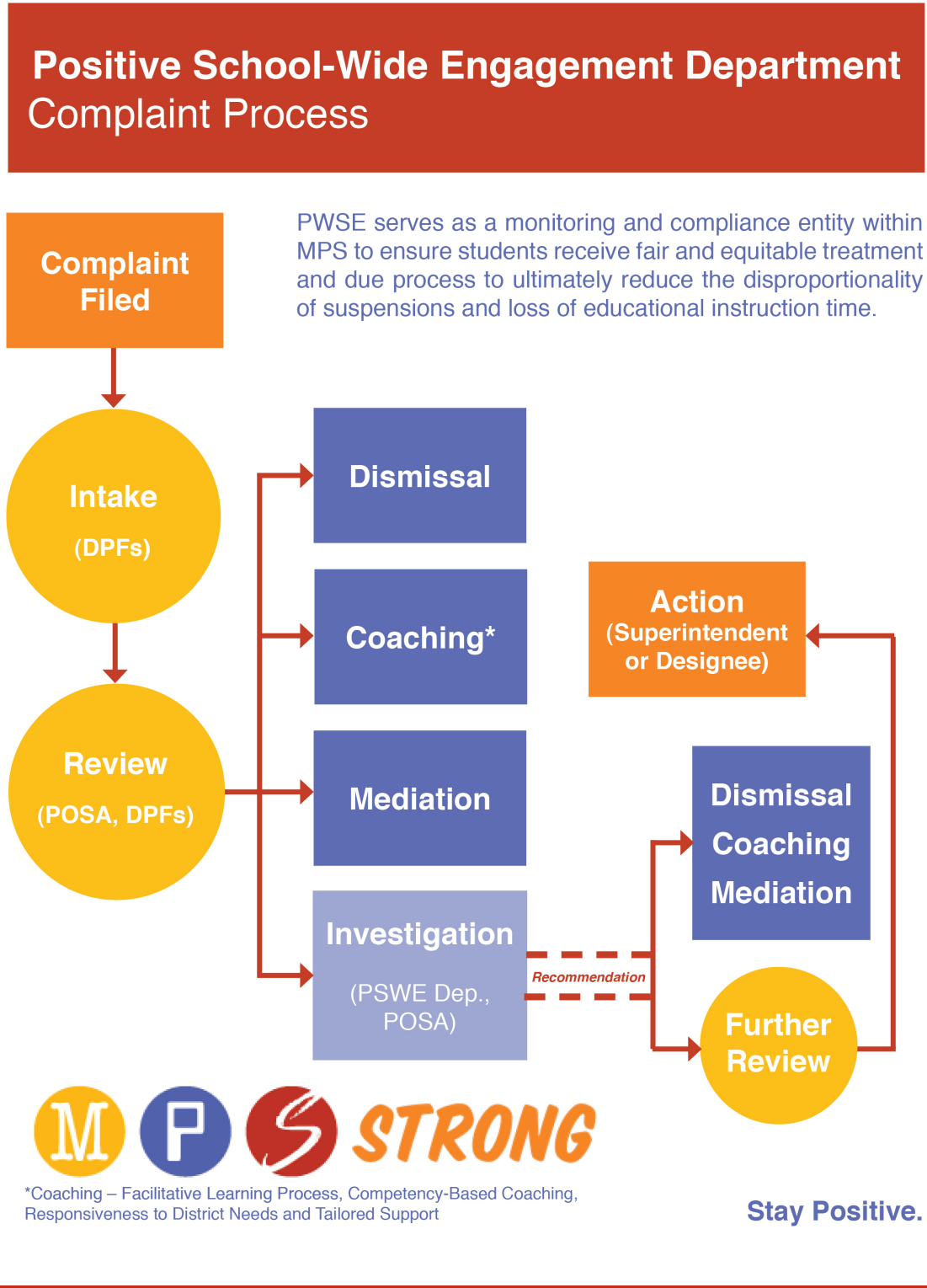
Improve School Culture and Climate: To be developed

Improve Forum Process: Parent Forum Process reviewed annually by District data team DPFs to identify areas of improvement and adopt best practices. Exemplary parent forums will be highlighted and leveraged to increase capacities of school sites to more effectively facilitate meaningful forums.

Increase Engagement: To be developed

Increase Site Accountability: School sites who are out of compliance with conducting forums in a timely manner or in accordance with the identified parameters and format or who fail to respond to suggestions for improvement will be reported to the Superintendent and or the Superintendent's designee as part of the data review process (as per OCR 19).

Increase District Commitment to Develop and implement Plans to Address Parent/Guardian Concerns:



Resolution Agreement #05-12-5001: Item #10 - Staff Training

Process: All District school sites were instructed to provide training programs to all teachers, administrators, school aides, and any other District personnel charged with supervising students, making disciplinary referrals or imposing disciplinary sanctions. In order to ensure compliance with fidelity, DPFs made numerous personal visits and provided consistent communication and technical assistance to school sites regarding the proper execution of the staff trainings. Documentation sheets were revised to ensure that documentation of staff training programs were in alignment with the Resolution Agreement #05-12-5001.

Compliance Status

- a. All District schools were informed that the trainings must emphasize the District's commitment to using its discipline policies, practices and procedures to ensure a safe and orderly educational environment and to ensure the fair and equitable treatment of all students when making disciplinary referrals and imposing disciplinary sanctions **as evidenced by the toolkit, staff training presentation deck, August POSA District PSWE Department memos, and ongoing meetings and site visits by DPFs.**
- b. All District schools were informed that, as appropriate, the training for District employees will include but not be limited to detailed explanations of the discipline policy, the definitions of offense categories, the specific manner in which progressive disciplinary consequences will be employed, if applicable, the circumstances under which deviations from established policies and procedures may be justified, the documentation that must be developed and maintained by all District staff who make disciplinary referrals or impose disciplinary sanctions, evidence-based techniques on classroom management and de-escalation approaches, information on how to administer discipline fairly and equitably, resources that are available to staff who are having difficulty with classroom discipline, resources that are available to students to assist them in developing self-management skills, the value of recognizing and reinforcing positive student behavior, and the importance of ensuring to the maximum extent possible that misbehavior is addressed in a manner that does not require removal from the educational program **as evidenced by the toolkit, staff training presentation deck, August POSA District PSWE Department memos, and ongoing meetings and site visits by DPFs.**
- c. All District schools were informed that the training must provide employees the opportunity to raise concerns or suggestions regarding the improvement of the District's disciplinary policies, including any issues in connection with fairness and non-discrimination on the basis of race **as evidenced by the toolkit, staff training presentation deck, August POSA District PSWE Department memos, and ongoing meetings and site visits by DPFs.**

Required Reporting: Staff trainings were conducted at 58 out of 62 sites. Sites have documented that the trainings occurred (**See Appendix folder OCR 10**).

Percentage of school sites in compliance: **93.55%**

Number of Sites out of compliance or lacking evidence/documentation: **4**

Next Steps:

Improve Staff Training: Better align training to OCR Requirements – Create different training models; more opportunities for staff input and suggestions.

Ensure Timelines: Training must occur in a timely manner at the beginning of the school year, and prior to OCR deadline.

Increase Site Accountability: School sites who are out of compliance with conducting trainings in a timely manner or in accordance with the identified parameters and format or who fail to properly document the trainings will be reported to the Superintendent and or the Superintendent's designee as part of the data review process (as per OCR 19).

Resolution Agreement #05-12-5001 Item #11 - Student Training

Process: All District school sites were instructed to provide training programs to all District students in an age appropriate, easily understood manner. In order to ensure compliance with fidelity, DPFs made numerous personal visits and provided consistent communication and technical assistance to school sites regarding the proper execution of the student trainings. Documentation sheets were revised to ensure that documentation of student training programs are aligned with the Resolution Agreement #05-12-5001.

Compliance Status

- a. All District schools were informed that the training must emphasize the District's commitment to using its discipline policies, practices and procedures to ensure a safe and orderly educational environment and to ensure the fair and equitable treatment of all students when making disciplinary referrals and imposing disciplinary sanctions and that the training will advise students of their right to appropriate due process procedures in connection with any disciplinary action taken or proposed by the District **as evidenced by the toolkit, August and October POSA District PSWE Department memos, ongoing meetings and site visits by DPFs and the Discipline Policy video.**
- b. All District schools were informed that the student training must include but not be limited to detailed explanations of the discipline policy, the definitions of offense categories, the specific manner in which progressive disciplinary consequences will be employed, if applicable, the circumstances under which deviations from established policies and procedures may be justified, resources that are available to students to assist them in developing self-management skills, and the District's commitment to recognizing and reinforcing positive

student behavior and to ensuring to the maximum extent possible that misbehavior is addressed in a manner that does not require removal from the educational program **as evidenced by the toolkit, August and October POSA District PSWE Department memos, ongoing meetings and site visits by DPFs and the Discipline Policy video.**

Required Reporting: Student trainings were conducted at 41 out of 62 sites. Sites have documented that the trainings occurred **(See Appendix folder OCR 11).**

Percentage of school sites in compliance: **72.58%**

Number of sites out of compliance or lacking evidence/documentation: **17**

Next Steps:

Improve Student Training: Better align training to OCR Requirements – Create different training models to be delivered to targeted age groups.

Ensure Timelines: Training must occur in a timely manner at the beginning of the school year, and prior to OCR deadline.

Increase Accountability: School sites who are out of compliance with conducting trainings in a timely manner or in accordance with the identified parameters and format or who fail to properly document the trainings will be reported to the Superintendent and or the Superintendent's designee as part of the data review process (as per OCR 19).

Appendix List

OCR 3

- Student Forum Documentation
- Schools Out of Compliance

OCR 4

- YPE Documentation
- YPE Evidence of Participation in Initial Activities
- Schools Out of Compliance
- Additional YPE Documentation

OCR 5

- School Site PSWE Team Rosters
- School Site PSWE Team Summaries of Initial Activities
- Schools Out of Compliance

OCR 6

- Parent Forum Documentation
- Schools Out of Compliance

OCR 10

- Staff Training Documentation
- Schools Out of Compliance

OCR 11

- Student Training Documentation
- Schools Out of Compliance

OCR General Documentation

- PSWE Update November 2016 Report
- 2015-2016 DIRS Report
- Student Training Videos (All Languages)
- Pertinent Memos, Etc.
- Toolkit
- Staff Training PPT

